

# Exhibit 24

Transcript of the Testimony of  
**Ray Perryman**

**Date:**

June 27, 2018

**Case:**

STATE OF TEXAS vs UNITED STATES of AMERICA

Ray Perryman

June 27, 2018

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION

STATE OF TEXAS, )  
Plaintiffs, ) Case No.  
vs. ) 1:18-cv-00068  
UNITED STATES OF AMERICA, et al., )  
Defendants, )  
and )  
KARLA PEREZ, et al., )  
Defendant-Intervenors. )

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ORAL DEPOSITION OF  
RAY PERRYMAN

Wednesday, June 27, 2018  
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Oral deposition of RAY PERRYMAN, produced as  
a witness at the instance of the Plaintiff States, and  
duly sworn, was taken in the above-styled and numbered  
cause on the 27th day of June, 2018, from 2:00 p.m. to  
4:44 p.m., before Deborah L. Endler, Notary Public in  
and for the State of Texas, reported by stenographic  
means, at the offices of the Attorney General, 300  
West 15th Street, 11th Floor, Austin, Texas 78701,

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1 pursuant to the Federal Rules of Civil Procedure and  
2 the provisions stated on the record or attached  
3 hereto.  
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A P P E A R A N C E S

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1 different way. If there are fewer workers in the  
2 workforce, that can potentially increase wages?

3 A. It can. That's an unproductive thing to  
4 have happen in society, but that can be one  
5 consequence.

6 Q. Okay. Now, if we go down, it says retirees  
7 have also been rehired? Do you see that?

8 A. Yes, sir.

9 Q. So that's saying in response to the labor  
10 shortage, retirees have also been rehired; right?

11 A. I talk about several things. That's one of  
12 them, yes, sir.

13 Q. Those retirees would have been outside of  
14 the labor force participation prior to being rehired;  
15 correct?

16 A. That's correct.

17 Q. So a labor shortage could potentially  
18 increase labor force participation?

19 A. Well, depending on how people respond to  
20 it, it can. What tends to happen is you have a trend  
21 going on. It's going to be socially going up or going  
22 down. And then depending on the economic conditions  
23 you get fluctuations in that month to month. The  
24 trend has been going down for a long time.

25 Q. Okay.

1 they all stayed, I don't think the number would  
2 change. But clearly to the extent people are  
3 classified as DACA, persons who are in the high school  
4 at this point in time, their education is being  
5 funded. But it's not because they are in DACA, it's  
6 because they are here.

7 Q. And is being funded in part by the State of  
8 Texas?

9 A. Correct, yes.

10 Q. And I jumped ahead of myself there. I  
11 meant to ask you about health care.

12 A. Okay.

13 Q. But same question as a lead-in, you don't  
14 dispute that the State of Texas does indeed incur a  
15 cost to provide health care to DACA recipients?

16 MR. HERRERA: Objection, asked and  
17 answered.

18 A. Again, the only clarification I would give  
19 is, again, for the undocumented population, since they  
20 use it, a little bit less for the DACA based  
21 population, but nonetheless I assume there would be  
22 some people in the DACA population who are likely to  
23 have some type of care that is reimbursed in some way  
24 by the state.

25 Q. And those types of care would be things



1 MR. HERRERA: Objection, calls for  
2 speculation.

3 A. Again, there is no way to know with  
4 certainty. That would not be a shocking thing to have  
5 happen, that you occasionally had something like that  
6 occur.

7 Q. Do you think it's likely to happen?

8 MR. HERRERA: Objection, calls for  
9 speculation.

10 A. Again, I'm not sure how else I can answer  
11 it. It's certainly a theoretical possibility that it  
12 could occur.

13 Q. Do you know from 2012 to present whether an  
14 employer has hired a DACA recipient for a job that a  
15 U.S. citizen also applied for?

16 A. I don't know one way or the other. It very  
17 well could have happened, but I don't know.

18 Q. And going forward into the future, do you  
19 know whether it is likely to happen again that an  
20 employer will hire a DACA recipient to fill a job that  
21 a U.S. citizen has also applied for?

22 MR. HERRERA: Objection, calls for  
23 speculation and mischaracterizes the witness's  
24 testimony.

25 A. Again, I have no way of knowing that. It's

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REPORTER'S CERTIFICATION  
DEPOSITION OF RAY PERRYMAN  
June 27, 2018

I, Deborah Endler, Shorthand Reporter in and  
for the State of Texas, do hereby certify that the  
foregoing deposition is a full, true and correct  
transcript:

That the foregoing deposition of RAY  
PERRYMAN, the Witness, hereinbefore named was at the  
time named, taken by me in stenograph on June 27,  
2018, the said Witness having been by me first duly  
cautioned and sworn to tell the truth, the whole truth  
and nothing but the truth and the same were thereafter  
reduced to typewriting by me or under my direction.

( ) That by agreement of counsel, a reading  
condensed copy of the deposition transcript along with  
the full-sized original Changes and Signature Sheet  
has been sent to \_\_\_\_\_ on  
\_\_\_\_\_ for review and signature within 30 days

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1 and if any corrections returned are attached hereto.

2 ( ) That the Witness shall have thirty (30)  
3 days for review and signature of the original  
4 transcript and if any corrections returned are  
5 attached hereto.

6 ( ) That the signed transcript ( ) was ( )  
7 was not received from the Witness within 30 days.

8 That the amount of time used by each party at  
9 the deposition is as follows:

10 Mr. Disher - 2 hours, 44 minutes

11 That before the completion of the deposition,  
12 the Deponent, and/or the Plaintiff/Defendant \_\_\_\_ did  
13 \_\_\_\_ did not request to review the transcript.

14 I further certify that I am neither counsel  
15 for, related to, nor employed by any of the parties or  
16 attorneys in this action in which this proceeding was  
17 taken, and further that I am not financially or  
18 otherwise interested in the outcome of the action.

19 WITNESS MY HAND, this the 28th day of June,  
20 2018.



21  
22 DEBORAH L. ENDLER, Reporter  
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